



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

August 15, 2008

CERTIFIED MAIL NO. 7007-3020-0000-9807-2252

RETURN RECEIPT REQUESTED

**Request for Information Pursuant to 3007(a) of the Resource Conservation and Recovery Act**

Richard Schommer  
Facilities, Purchasing, Environmental Manager  
Valley-Todeco, Inc.  
12975 Bradley Ave.  
Sylmar, CA 91342  
EPA Identification Number: CAT080014103

Dear Mr. Schommer:

The purpose of this letter is to direct you or another duly authorized representative of Valley-Todeco, Inc. ("Valley-Todeco" or "the facility") to respond in writing to this request for information resulting from a hazardous waste compliance inspection conducted at your facility on August 8, 2008 by a United States Environmental Protection Agency inspection team ("EPA").

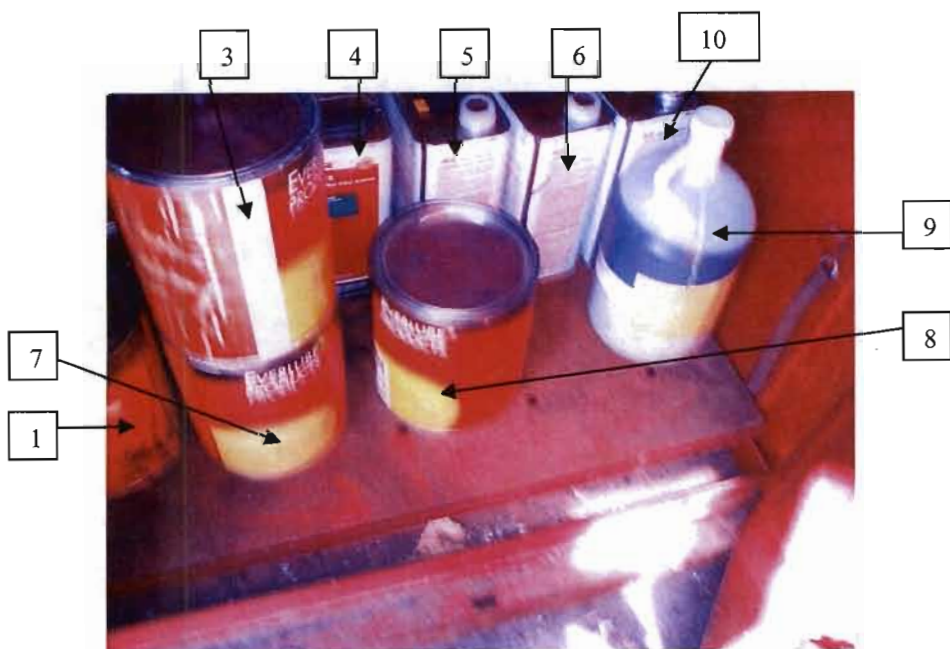
Under the provisions of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA") {42 U.S.C. § 6927(a)}, the EPA may require persons subject to RCRA to furnish information necessary for the EPA to administer the Act. This particular Request For Information concerns a paint locker on Valley-Todeco's premises next to the facility's hazardous waste storage area. Pursuant to the EPA's authority set forth in Section 3007(a), you are required to submit the following information to the EPA:

**For the sake of convenience, each container has been assigned a number. Please review the photos below, and provide the following information for each container:**

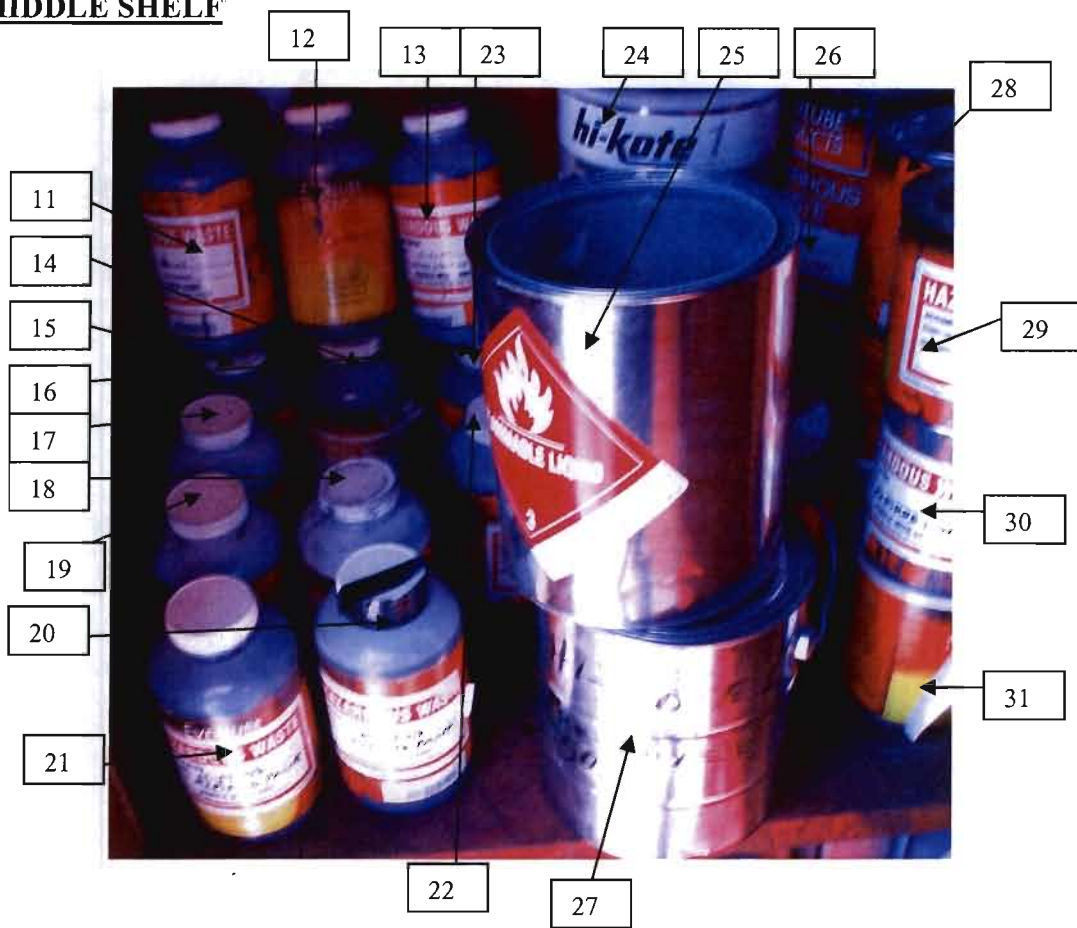
- the identification of the container's contents;
- whether or not the container's contents constitute "a waste";
- if a waste, whether or not these contents are hazardous;
- if hazardous, identify the nature of the hazard, and whether the waste in question is a RCRA or non-RCRA hazardous waste (including waste codes);
- if a hazardous waste, the initial date that this container has been stored in this waste storage area;
- if any of this waste has since been manifested offsite, please include a copy of the manifest, including an identification of the waste involved.

When providing information regarding each of these containers, for the sake of clarity, please use the corresponding reference number assigned to each container.

**LOWER SHELF**



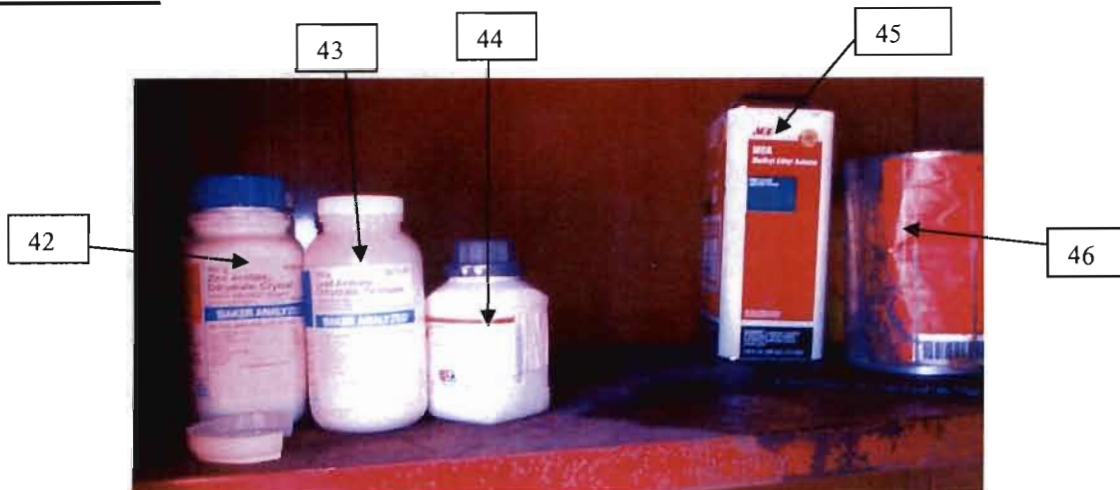
# MIDDLE SHELF



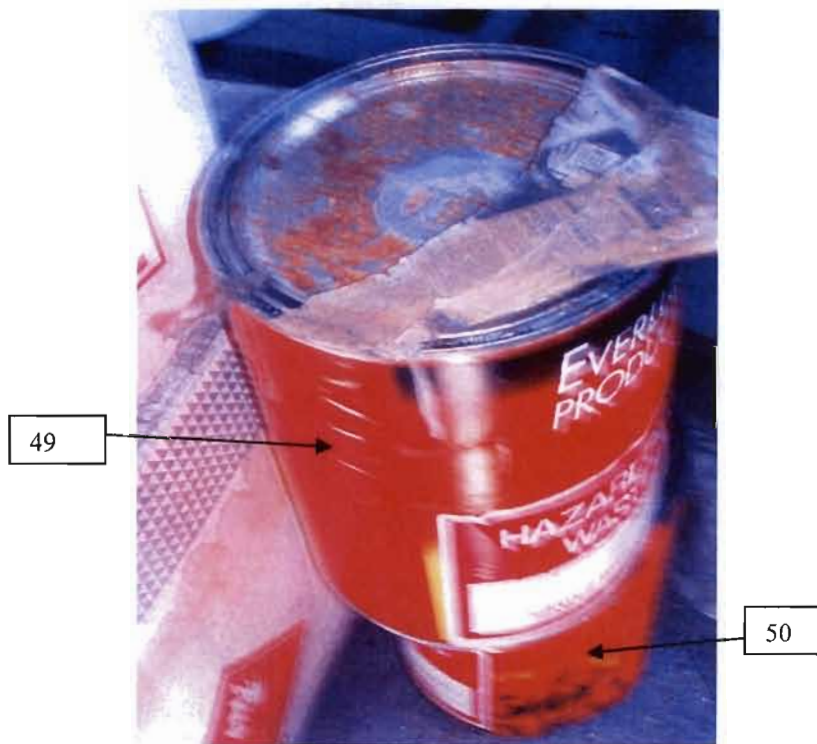
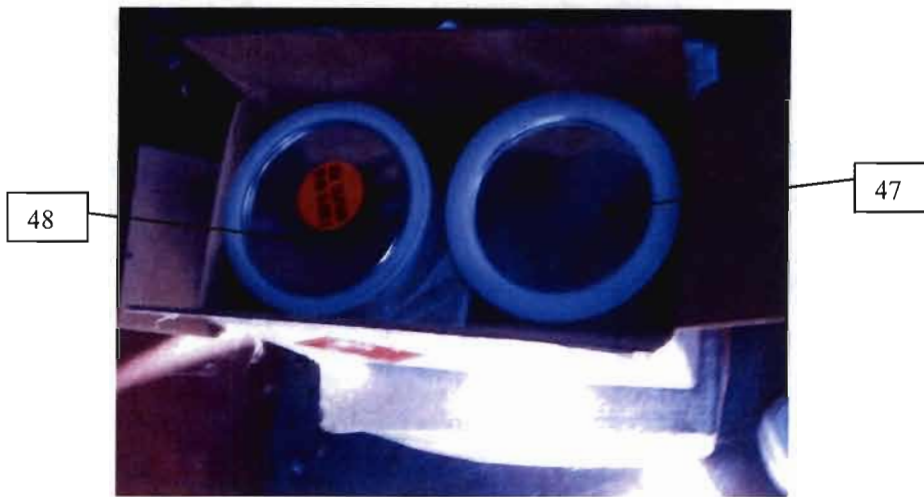




**UPPER SHELF**



ADJACENT TO LOCKER



Section 3008 of RCRA {42 U.S.C. § 6928}, authorizes the initiation of a civil enforcement proceeding for failure to respond fully to the information request set out in this letter. Section 3008 also authorizes criminal prosecution for knowingly making a false statement or omitting material information.

EPA regulations governing confidentiality of business information are set forth in 40 C.F.R. Part 2, Subpart B. For any portion of the information submitted which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.203(b). If the EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. § 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. As described in 40 C.F.R. § 2.203(a)(2), the EPA will construe the failure to furnish a confidentiality claim within 14 calendar days from the date of your receipt of this letter as a waiver of that claim, and information may be made available to the public by the EPA without further notice.

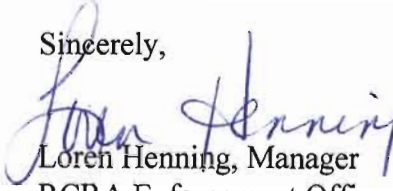
This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§ 3502(3), 3507, 3512, and 3518(c)(1) {5 C.F.R. §§ 1320.3(c), 1320.4, and 1320.6(a)}. Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons {44 U.S.C. § 3502(4), (11); 5 C.F.R. §§ 1320.4 and 1320.6(a)}.

Your response to this request must be made by letter, signed by a duly authorized official, and submitted to the EPA within 14 calendar days from the date of your receipt of this letter. Please address the submittal to:

Clint Seiter  
Mailcode: WST-3  
RCRA Enforcement Office  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

If you have any questions regarding this letter, please contact Clint Seiter of my staff at (415) 972-3298. Your cooperation in this matter is appreciated.

Sincerely,

  
Loren Henning, Manager  
RCRA Enforcement Office

cc: Jeff Holwager, LA County Fire Department  
Charles McLaughlin, DTSC



